

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D. C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY


POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

INTERROGATORIES OF ADVO, INC. TO ASSOCIATION OF
ALTERNATE POSTAL SYSTEMS WITNESS WHITE (ADVO/AAPS-T1-1-16)

Pursuant to sections 25 and 26 of the Rules of Practice, Advo, Inc. (Advo) directs the following interrogatories to Association of Alternate Postal Systems witness White. .

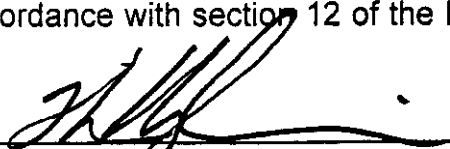
Respectfully submitted,



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Counsel for ADVO, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Thomas W. McLaughlin

June 19, 2000

ADVO, INC. INTERROGATORIES TO AAPS WITNESS WHITE

ADVO/AAPS-T1-1. Please confirm that Distribution Systems of Oklahoma is a division of The Oklahoma Publishing Company, publisher of Oklahoma's largest newspapers, The Daily and Sunday Oklahoman. If you cannot confirm, please describe specifically the legal and corporate relationships between Distribution Systems of Oklahoma and both The Oklahoma Publishing Company and The Daily and Sunday Oklahoman.

ADVO/AAPS-T1-2. Please confirm that The Daily and Sunday Oklahoman is the only daily local newspaper in the Oklahoma City metropolitan MSA area (excluding college newspapers). If you cannot confirm, please identify each other daily local newspaper in the MSA area, and provide its estimated daily circulation.

ADVO/AAPS-T1-3. Please confirm that Distribution Systems of Oklahoma provides weekly Wednesday delivery of The Express Line, the total market coverage (TMC) product of The Daily Oklahoman.

ADVO/AAPS-T1-4. Please describe DSO's distribution and circulation of The Express Line TMC product, including the following:

- (a) Is The Express Line distributed by DSO only to nonsubscribers of The Daily Oklahoman newspaper, or is it also distributed to subscribers?
- (b) Please provide the weekly nonsubscriber circulation of The Express Line distributed by DSO.
- (c) Please provide the weekly subscriber circulation of The Express Line distributed by DSO.
- (d) Please provide the total subscriber circulation of The Daily Oklahoman in the areas or zones where DSO distributes The Express Line.
- (e) Please provide the total household count in the areas or zones where DSO distributes The Express Line.
- (f) In areas or zones where DSO distributes The Express Line, does DSO make deliveries to all households or just to those that are to receive The Express Line?

ADVO/AAPS-T1-5. Please provide the following information for both Distribution Systems of Oklahoma and The Daily and Sunday Oklahoman.

- (a) For each year from 1987 to the present, please provide the total annual volume of preprint circulars distributed by (i) The Daily and Sunday Oklahoman, and (ii) Distribution Systems of Oklahoma.
- (b) For each year, of the total volume of preprints distributed by DSO, how many were distributed only to nonsubscribers of The Daily Oklahoman?
- (c) In addition to the Express Line and preprints, has DSO delivered other publications such as shoppers or buyers guides? If so, please provide the annual volumes of such publications distributed by DSO from 1987 to the present.

ADVO/AAPS-T1-6. Does DSO offer its distribution services to independent shopper or buyers guide publications (i.e., publications not affiliated with the Oklahoman newspaper)? If so,

- (a) Please provide the rates offered or charged for such distribution services.
- (b) Does DSO accept preprint inserts that accompany a shopper publication? If so, please provide the rates offered or charged for preprints accompanying such a publication.

ADVO/AAPS-T1-7. Please identify (by estimated annual preprints distributed in the Oklahoma City metro area MSA market) the five largest multi-page preprint distribution competitors of Distribution Systems of Oklahoma and The Daily and Sunday Oklahoman. For each competitor, please

- (a) indicate its primary method of preprint distribution (i.e., privately delivered newspaper inserts, mailed newspaper inserts, privately delivered shopper publication inserts, mailed shopper publication inserts, or saturation shared mail).
- (b) provide an estimate of its annual volume of preprints distributed in the Oklahoma City MSA market.

ADVO/AAPS-T1-8. Please provide the following market share information. If precise data are not available, please provide DSO/The Daily and Sunday Oklahoman's best estimate of its market share, and explain the basis for the estimate.

- (a) What is the market share of multi-page preprint circulars held by DSO/The Daily and Sunday Oklahoman in the Oklahoma City metro MSA area?
- (b) What is the market share of single-sheet (8" x 10" or larger) preprint circulars held by DSO/The Daily and Sunday Oklahoman in the Oklahoma City metro MSA area?
- (c) If information on the breakout of multiple-page v. single-sheet preprints is not available, what is the market share of total preprint circulars held by DSO/The Daily and Sunday Oklahoman in the Oklahoma City metro MSA area?

ADVO/AAPS-T1-9. Please provide copies of the last two issues of The Express Line, the TMC product of The Daily Oklahoman that is delivered by DSO, including inserts and other materials distributed along with it.

ADVO/AAPS-T1-10.

- (a) What is the average weight, and weight range, of The Express Line product distributed by DSO?
- (b) What is the average weight, and weight range, of The Express Line product including preprint inserts?
- (c) What is the average number of preprint inserts carried in The Express Line, and the average weight and weight range of those individual preprint inserts?

ADVO/AAPS-T1-11. Please provide the current retail rate card (or booklet) of The Daily and Sunday Oklahoman newspaper, including rates for distribution of preprint inserts. If the rate cards do not show specific rates for preprint inserts, please provide the rates charged for preprint inserts, including rates by weight or pages, and volume and frequency discounts.

ADVO/AAPS-T1-12. Please provide the current retail rate card (or booklet) of Distribution Systems of Oklahoma, including rates for distribution of preprint inserts. If the rate cards do not show specific rates for preprint inserts or other publications, please provide the rates charged for preprint inserts and other publications, including rates by weight or pages, and volume and frequency discounts.

ADVO/AAPS-T1-13. At page 2 of your testimony, you state that:

"Weekly deliveries to approximately 282,000 homes typically consist of commercial publications delivered by individual carrier route. Mostly, these publications would qualify as Standard mail saturation advertising pieces, or are phone books, packaged product samples, address specific newspapers, and doorhangers (coupon cards that are specifically hold punched to fit door handles)."

- (a) Please identify, by newspaper title and publisher, the "address specific newspapers" delivered by DSO. Please identify which, if any, of these newspapers are not owned or affiliated with The Oklahoma Publishing Company and The Daily and Sunday Oklahoman newspaper.
- (b) Please identify, by publication title and publisher, the "commercial publications" delivered by DSO. Please identify which, if any, of these commercial publications are not owned or affiliated with The Oklahoma Publishing Company and The Daily and Sunday Oklahoman newspaper.

ADVO/AAPS-T1-14. At page 5 of your testimony, you state: "As for shared mail packages, in our market, the Postal Service competes vigorously with alternate delivery for business." Please identify the companies that, on a regular basis (monthly or more frequently), offer shared mail programs in your market.

ADVO/AAPS-T1-15. At page 7 of your testimony, you state that some of the members of AAPS are owned by newspapers. Please identify each of the members of AAPS that is owned, controlled, or affiliated with a newspaper; and for each, identify the newspaper name and the parent company.

ADVO/AAPS-T1-16. In your response to USPS/AAPS-T1-9, you state that "We have already been driven out of the light weight market."

- (a) Please define what you mean by "the light weight market."
- (b) For the period from 1991 to the present, please provide the annual volumes of preprint inserts and other materials distributed by DSO that (i) fall within your definition of "the light weight market," and (ii) fall outside that definition.